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Rimini Street, Inc., and Seth Ravin

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

ORACLE USA, INC., a Colorado corporation;
and ORACLE INTERNATIONAL
CORPORATION, a California corporation,

Plaintiffs,

v.

RIMINI STREET, INC. , a Nevada corporation;
SETH RAVIN, an individual,

Defendants.

Case No. 2:10-cv-0106-LRH-PAL

**DEFENDANTS RIMINI STREET
AND SETH RAVIN'S PROPOSED
JUDGE-DIRECTED VOIR DIRE
QUESTIONS**

1. Has anyone read any media accounts about this case or about any of the parties – Oracle or Rimini Street?
 - a. Please tell me what you've read or heard.
2. Have you or anyone in your family ever worked for either Oracle or Rimini Street?
 - a. In what capacity, and for how long?
 - b. If you are no longer working there, did you leave on good terms?
3. Does anyone know anyone who has worked for either Rimini Street or Oracle?
 - a. Who, in what capacity, and for how long?
 - b. If they are not longer working there, do you know if they left on good terms?
4. Has anyone had any negative experiences with either Oracle or Rimini Street?
5. Raise your hand if you, or someone close to you, has ever worked in law enforcement?
 - a. Identify the person and describe their relationship with you.
6. Raise your hand if you, or someone close to you, has ever served in the military?
 - a. Identify the person and describe their relationship with you.
7. Raise your hand if you, or someone close to you, has ever had any education, training, or job-related experience in any of the following:
 - a. Law or the legal system

- 1 b. Copyrights, patents or trademarks
- 2 c. Licenses or licensing
- 3 d. Enterprise software
- 4 e. Maintaining or installing software
- 5 f. Other high-tech fields, such as computers, software, hardware
- 6 8. Do you consider yourself to have little or no understanding of computer technology?
- 7 9. Have you ever been involved in a lawsuit?
- 8 a. How were you involved?
- 9 b. Were you a plaintiff or defendant?
- 10 c. How was that experience?
- 11 10. Have you ever served on a jury before?
- 12 a. How many times?
- 13 b. Was it a civil or criminal case?
- 14 c. Did you serve as foreperson?
- 15 d. What was the verdict?
- 16 11. Raise your hand if you have ever invented something?
- 17 a. Please tell me more about that.
- 18 12. Have any of you ever had an idea or invention that you believe was taken or infringed by
- 19 another person or company?
- 20 a. Explain what happened?
- 21 13. Who here has ever worked for a large, for-profit company?
- 22 a. How big was the company?
- 23 b. What was its business?
- 24 c. Would you describe your work experience with the company as positive or negative?
- 25 14. Raise your hand if you have ever worked in a “start-up” company?
- 26 a. What was your position?

- 1 b. Was the company ultimately successful?
- 2 c. How would you describe your experience?
- 3 15. Do you have any experience in corporate accounting or finance?
- 4 a. Please explain.
- 5 16. Raise your hand if you have ever felt taken advantage of in any way in a business situation?
- 6 a. Please tell me more about that.
- 7 b. Raise your hand if, as a part of any job that you might have had, been required to
- 8 interpret or analyze contracts?
- 9 c. Please explain more about those instances.
- 10 17. Raise your hand if, as a part of your job, you have to regularly use computers or software?
- 11 a. Tell me more about that.
- 12 18. How many of you rarely or never use a computer?
- 13 19. Raise your hand if you have never loaded software onto a computer?
- 14 20. Raise your hand if you have never updated software on your computer or mobile phone?
- 15 21. Raise your hand if you have never used the “copy and paste” feature when creating a
- 16 document or email?
- 17 22. How many of you have downloaded music before?
- 18 a. For those of you who have never downloaded music, is there a specific reason why
- 19 you have not?
- 20 23. Raise your hand if you consider yourself a musician?
- 21 a. Have you ever earned money as a musician?
- 22 b. Have you ever recorded music?
- 23 24. Do any of you regularly read any publication or website?
- 24 a. Please identify the publication or website
- 25 25. Raise your hand if you currently or in the past have held any kind of leadership position in an
- 26 educational, civic, community, or religious group.

- 1 a. What was or is that leadership position?
- 2 b. What type of responsibilities did that position entail?
- 3 26. Raise your hand if you believe that, if a lawsuit goes to trial, it must be a strong case.
- 4 a. Please tell me a little more about your opinion in this regard.
- 5 27. Defendants already have been found by the Court to have infringed certain Oracle
- 6 copyrights, but other claims of copyright infringement remain unresolved in the case and will
- 7 require determination by you the jury.
- 8 a. How many of you feel that, because the defendants have been found to infringe some
- 9 copyrights, they are more likely to have infringed others?
- 10 b. How many of you feel that, because the defendants have been found to infringe, they
- 11 are more likely to have committed other unlawful acts?
- 12 28. Before this trial, the Court found that Defendants deleted a directory of Oracle software that
- 13 was in their possession before this lawsuit began.
- 14 a. How many of you believe that, because Defendants deleted evidence in this case, they
- 15 are more likely to have infringed Oracle's copyrights?
- 16 29. Oracle is seeking to recover damages it allegedly suffered as a result of Defendants'
- 17 infringement.
- 18 a. How many of you feel that, because they own the copyrights, they should be given
- 19 the benefit of the doubt when proving their damages?
- 20 b. How many of you feel that, because the Court has already found Defendants violated
- 21 certain copyrights, Oracle should be given whatever amount of damages it seeks.
- 22 30. Any money damages in this case may be awarded only to compensate Oracle for any harm
- 23 allegedly suffered as a result of Defendants' infringement.
- 24 a. How many of you feel that damages in a case like this should also be used to punish
- 25 the Defendants or to "send a message"?
- 26 31. Based on what you have heard about the parties in this case and my rulings prior to this trial,
- 27

1 how many of you will find it difficult to view the parties in totally neutral manner?

2 a. Based on what you have heard, is anyone inclined to be leaning toward one party or
3 the other in this case?

4 32. In this case, Oracle gets to present its evidence first before Rimini gets to respond and put on
5 its evidence.

6 a. Based on what you have heard so far, raise your hand if you will find it difficult to
7 withhold your judgment on the merits of this case until after you have seen Rimini's
8 evidence.

9
10 DATED: September 9, 2015 SHOOK, HARDY & BACON

11
12 By: /s/ Robert H. Reckers
13 Robert H. Reckers, Esq.

14 *Attorney for Defendants*
15 *Rimini Street, Inc. and Seth Ravin*

16 **CERTIFICATE OF SERVICE**

17 I hereby certify that the foregoing DEFENDANTS RIMINI STREET AND SETH RAVIN'S
18 PROPOSED JUDGE-DIRECTED VOIR DIRE QUESTIONS was served, via Court's CM/ECF
19 System, on September 9, 2015, which will send notice to registered attorneys as indicated below.
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By: /s/ Robert H. Reckers